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November 1, 2002

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Via Hand Delivery

FEDERAL COMMUNICATIONS COMMISSION
 OFFICE OF THE SECRETARY

Marlene H. Dortch
 Secretary
 Federal Communications Commission
 445 12th Street, S.W.
 Washington, DC 20554

Re: *American Cellular Corporation E911 Quarterly Report -
 CC Docket No. 94-102*


Dear Ms. Dortch:

American Cellular Corporation and its subsidiaries, by its attorneys, hereby submit the attached Quarterly Report on their progress toward and compliance with the terms and conditions of the *Order to Stay* and the Commission's E911 rules.¹

If there are any questions regarding this matter, please contact the undersigned.

Sincerely,

WILKINSON BARKER KNAUEK, LLP



By: Zachary A. Zehner

Attachment

cc: David H. Solomon, Chief, Enforcement Bureau
 Thomas J. Sugrue, Chief, Wireless Telecommunications Bureau
 Johri Ramsey, Executive Director, APCO
 Robert M. Gurss, Counsel, APCO
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 Evelyn Bailey, NASNA

¹ See *Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems*, CC Docket No. 94-102, Order to Stay, 17 FCC Rcd 14841 (2002) ("Order to Stay").

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E911 Status – Quarterly Report

November 1, 2002

Summary of Report

Pursuant to the *Order to Stay*,¹ American Cellular Corporation,² as a Tier II carrier, provides in this Quarterly Report ("Report") information on all pending requests for Phase I and Phase II it has received, including the entity requesting service, the date the request was received,³ and the status of the request. For Phase I requests that have been pending for over six months, ACC has also included the projected deployment date (if available) and a brief description of the reasons for the delay and steps it has taken to resolve the issues causing the delay. Detailed information regarding the requests is contained in the attached table.

Phase I Service

ACC has received **74** requests for Phase I services and has activated service in full or in part in 58 of these jurisdictions. The carrier has worked diligently with its third-party location solution vendors, TCS Corp. and Intrado, as well as the public safety community, in coordinating Phase I deployment. As discussed in the table, Phase I services were not activated within six months of the date the PSAP request in several jurisdictions for a variety of reasons. For instance, in Kentucky, delays were caused partially because numerous PSAPs in the state were required to obtain certification from the state's CMRS board. In order to begin the certification process, however, a PSAP was required to submit Phase I requests to carriers, although the PSAP could not begin preparing for deployment until it had obtained certification, as funding for E911 upgrades was part of the certification process. Despite these delays, ACC was one of the first carriers to deploy Phase I services in the state. In West Virginia and Michigan, moreover while ACC was the first carrier to deploy Phase I services, it and the various PSAPs experienced numerous administrative and technical delays in coordinating Phase I deployment.

As a demonstration of its good faith, Dobson is treating the remaining 16 fully-pending and 7 partially-pending Phase I requests as valid, although several would no longer be active pursuant to Section 20.18(j) and the *Richardson* criteria.⁴ The company remains committed to working with its vendors, the PSAPs, and the states, in order to deploy Phase I services in these Jurisdictions as soon as possible.

Phase II Service

A. Deployment Preparation

As discussed in its waiver petition, ACC is a mid-sized carrier servicing predominantly rural and suburban markets in 12 states. The company relies primarily upon a TDMA-based

¹ See *Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems*, CC Docket No. 94-102, Order to Stay, 17 FCC Rcd 14841 (2002) ("*Order to Stay*").

² This Report is being filed on behalf of American Cellular Corporation and its subsidiaries (collectively "ACC").

³ As indicated in the table, the provided "request date" indicates the date the PSAP/requesting entity sent its request to ACC. This date may not correspond with the date the PSAP's/requesting entity's request was "valid" per Section 20.18(j) of the rules.

⁴ 47 C.F.R. § 20.18(j); *Revision of the Commission's Rules To Ensure Compatibility with Enhanced 911 Emergency Calling Systems, Petition of City of Richardson*, CC Docket No. 94-102, Order, 16 FCC Rcd 18982 (2001) ("*Richardson*").

network of base stations and switching equipment. As a result of the lack of commercial availability of compliant handset-based Phase II location solutions for TDMA carriers, the company has taken steps to prepare to deploy a network-based solution.

ACC's network consists of approximately 9 Mobile Switching Centers, all of which utilize equipment manufactured by Nortel Networks ("Nortel"). ACC has worked with Nortel to prepare for Phase II deployment; all switch upgrades necessary to supply Phase II services were completed by Nortel by June, 2002.

In addition, ACC is in final contract negotiations with a leading provider of Phase II network-based location solutions. As a part of these negotiations, ACC has agreed not to reveal the vendor's name in this Report; however, it believes that a contract will be executed in the near future. The vendor has represented that at this time it appears that it will be able to provide Phase II services in response to the valid PSAP request discussed below.

B. Phase II Requests

ACC has received requests for Phase II service from the following jurisdictions: Hocking County, OH; the State of Minnesota; Rowan County, KY; and Montgomery County, KS. In response to Hocking County, on October 3rd, 2002, the company sent correspondence to the appropriate contact, stating that it is tentatively considering its request "valid" and intends to provide Phase II services by March 1, 2003. Nevertheless, to ensure that it may properly prioritize its E911-designated resources, ACC requested that the Hocking County PSAP provide documentation pursuant to the *Richardson* proceeding.⁵ ACC received a response from Hocking County on October 7th, 2002 and the carrier is proceeding with its Phase II deployment plans for the jurisdiction.

As detailed in the table, after repeated attempts to confirm the status of readiness of the PSAPs located in the state, ACC no longer considers Minnesota's Phase II request active. The company will respond to Minnesota upon receipt of a new request for Phase II services.

ACC has also attempted to confirm the status of readiness of the PSAP in Rowan County on several occasions. While the County responded in part to the carrier's second request for information, it has not responded to ACC's correspondence (dated August 26th, 2002) requesting clarification and documentation pursuant to the *Richardson* proceeding.⁶

In addition, ACC received Montgomery County's combined request for E911 services on July 15, 2002. In working on Phase I deployment, ACC learned that the PSAP had no trunking from the respective selective router at the time it submitted its request. In light of this discovery, ACC sent correspondence on October 29th, 2002 requesting documentation of the County's Phase II readiness. ACC remains willing to discuss an implementation date with the administrators of both Rowan and Montgomery counties, once it has received a response to its request for documentation pursuant to *Richardson*.⁷ While the company remains committed to meeting its E911 Phase II obligations, it will proceed with deployment plans based upon appropriate assurances that the PSAPs meet the Commission's readiness criteria.

⁵ *Id.*

⁶ *Id.*

⁷ *Id.*

C. Other

As a Tier II provider employing a network-based Phase II solution, pursuant to the *Order to Stay*, ACC intends to provide Phase II service to at least 50 percent of a requesting PSAP's coverage area or population beginning March 1, 2003, or within six months, whichever is later, and to 100 percent of the PSAP's coverage area by March 1, 2004, or within 18 months, whichever is later. **ACC** remains committed to meeting these deployment benchmarks in response to valid PSAP requests for Phase II service.

In discussions with its prospective Phase II location solution vendor, however, ACC has learned that leasing and zoning issues may affect ACC's ability to meet the interim deployment deadlines in some markets. Specifically, in order to meet the Commission's network-based accuracy requirements, its prospective vendor has informed the company that it may need to install Angle-of-Arrival ("AOA") antennas at certain cell sites in addition to the Time Difference of Arrival ("TDOA") equipment that will be installed in individual cell sites. ACC has also been informed that installing AOA antennas may require tower modifications, lease modifications, and zoning approvals – any of which present the potential for delay.

While ACC does not currently foresee problems related to the AOA antennas, it is bringing this to the Commission's attention as a potential issue that may affect ACC's ability to provide compliant Phase II services by March 1, 2003. Furthermore, ACC brought similar matters to the Commission's attention in its original waiver request.⁸ Accordingly, if necessary, ACC may avail itself of further waiver procedures to account for the potential market-specific shortcomings a network-based solution in its rural markets may present. The Commission has indicated that it will consider such requests.⁹

As required by the *Order to Stay*, a copy of this report is being filed with the Chief of the Enforcement Bureau, the Chief of the Wireless Telecommunications Bureau, and the Executive Directors and Counsels of APCO, NENA, and NANSA.

⁸ See American Cellular Corporation Petition for Waiver of Sections 20.18(e), (f), and (h) of the Commission's Rules, CC Docket No. 94-102, at 11-15 (filed Sept. 4, 2001).

⁹ See *Order to Stay* at ¶ 41.

**American Cellular Corporation
Wireless E9-1-1 Phase I & II
Service & "Request" Summary Table**

YMENT --

State	County	Requesting Entity Name	Request Date'	Statusreason for Delay	Steps Taken to Resolve Deployment Problems for Requests Pending Over Six Months	Expected Deployment
KY	Laurel/ London	Laurel/ London County	11/16/00	Service activated 11/28/01 PSAP: At time of delivery, PSAP was certified but not ready to receive Phase I data.		
KY	Barren	Barren/Metcalf	N/A	Service activated 11/27/01		
KY	Nelson	Nelson County	N/A	Service activated 11/27/01 to Kentucky State Police Post # 4		
KY	Rockcastle	Rockcastle County	N/A	Service activated 9/24/01 to Kentucky State Police Post # 11		
KY	Wayne	Wayne County	N/A	Service activated 9/24/01 to Kentucky State Police Post # 11		
KY	McCreary	McCreary County	N/A	Service activated 9/24/01 to Kentucky State Police Post # 11		
KY	Mason	Mason County	N/A	Service activated 8/29/01		
KY	Hart	Hart County	N/A	Service activated 8/21/01 to Kentucky State Police Post # 3		
KY	Danville	Danville County	N/A	Service activated 8/14/01		
KY	Boyle	Boyle County	N/A	Service activated 8/14/01		

¹ Indicates date PSAP sent letter to ACC requesting service, does not correspond with date PSAP's request was "valid" per Section 20 18(j) of the rules

State	County	Requesting Entity Name	Request Date	Status/Reason for Delay	Steps Taken to Resolve Deployment Problems for Requests Pending Over Six Months	Expected Deployment Date
KY	Bath	Bath County	N/A	Service activated 6/05/01 to Kentucky State Police Post # 8		
KY	Lewis	Lewis County	N/A	Service activated 6/05/01 to Kentucky State Police Post # 8		
KY	Menifee	Menifee County	N/A	to Kentucky State Police Post # 7		
KY	Lincoln	Lincoln County	N/A	Service activated 5/31/01 to Kentucky State Police Post # 7		
KY	Russell	Russell County	N/A	Service activated 5/18/01 to Kentucky State Police Post # 15		
KY	Cumberland	Cumberland County	N/A	Kentucky State Police Post # 15		
KY	Clinton	Clinton County	N/A	Service activated 5/18/01 to Kentucky State Police Post # 15		
KY	Spencer	Spencer County	N/A	Service activated 8/09/01 to Kentucky State Police Post # 12		
KY	Montgomery	Montgomery County	N/A	Service activated 9/19/01 to Kentucky State Police Post # 8		
KY	Madison	Madison County	N/A	Service activated 7/13/01		
KY	Morehead/Rowan	Morehead/Rowan County	11/09/0	Service activated 12/07/01 to Kentucky Police Post # 8.		

State	County	Requesting Entity Name	Request Date'	Status/Reason for Delay	Steps Taken to Resolve Deployment Problems for Requests Pending Over Six Months	Expected Deployment Date
KY	Adair	Adair County	07/02/01	Service activated 12/06/01		
KY	Monroe	Monroe County	01/04/01	Service activated 3/21/02 PSAP: At time of delivery, PSAP was certified but not ready to receive Phase I data due to problems with the CPE.		
KY	Taylor	Taylor County	12/04/00	Service activated 3/22/02 LEC/PSAP: At time of delivery, trunks from LEC delayed and PSAP certified but not ready to receive Phase I data due to CPE problems.		
KY	Mercer	Mercer County	04/30/01	Service activated 5/01/02 LEC: At time of delivery, trunks from Selective Router to PSAP not ready.		
KY	Pulaski	Pulaski County	07/17/00	Service activated 12/05/01 PSAP: At time of delivery, PSAP was certified but not ready to receive Phase I data due to CPE problems.		
KY	Anderson	Anderson County	02/28/01	Service activated 2/18/02 PSAP/LEC: At time of delivery, trunks from Selective Router to PSAP were not correct.		
KY	Hardin	Hardin County	07/06/00	Service activated 12/20/01 PSAP/State: At time of delivery, PSAP was		

State	County	Requesting Entity Name	Request Date'	Status/Reason for Delay	Steps Taken to Resolve Deployment Problems for Requests Pending Over Six Months	Expected Deployment Date
				awaiting certification from the CMRS Board and CPE equipment was not ready.		
KY	Larue	Larue County	07/17/00	Service activated 12/19/01 PSAP: At time of delivery, PSAP's CPE equipment not ready. Also, PSAP requested address changes and RF Maps modifications.		
KY	Green	Green County/Greensburg	12/12/00	Service activated 12/11/01 PSAP/State/LEC: At time of delivery, PSAP was awaiting certification from the CMRS Board, faced trunking problems with LEC and its CPE equipment was not ready.		
KY	Casey	Casey County	N/A	Service activated 12/14/01 to Kentucky State Police Post # 15		
KY	Bracken	Bracken County	N/A	Service activated 4/19/02 to Kentucky State Police Post # 6		
KY	Nicholas	Nicholas County	N/A	Service activated 4/19/02 to Kentucky State Police Post # 6		
KY	Robertson	Robertson County	N/A	Service activated 4/23/02 to Kentucky State Police Post # 6		
WV	Marion	Office of Emergency Management of the State	06/01/00	Service activated 4/11/01 State/PSAP: Cost recovery		

State	County	Requesting Entity Name	Request Date'	Status/Reason for Delay	Steps Taken to Resolve Deployment Problems for Requests Pending Over Six Months	Exnected Deployment Date
WV	Monongalia	Office of Emergency Management of the State of West Virginia	06/01/00	Service activated 3130101 State/PSAP: Cost recovery issues.		
WV	Harrison	Office of Emergency Management of the State of West Virginia	06/01/00	Service activated 3/30/01 State/PSAP: Cost recovery issues.		
WV	Preston	Office of Emergency Management of the State of West Virginia	06/01/00	Service activated 4/11/01 State/PSAP: Cost recovery issues.		
WV	Taylor	Office of Emergency Management of the State of West Virginia	06/01/00	Service activated 8/27/02 PSAP/ACC: Difficulty in reaching agreement re: CPE equipment.		
MI	Marquette	Michigan Communications Directoi Association	04/30/01	Service activated 2/21/02 All: Administrative issues.		
MI	Dickinson	Michigan Communications Directoi Association	04/30/01	Service activated 2/21/02 All: Administrative issues.		
MI	Menominee	Michigan Communications Directoi Association	04/30/01	Service activated 2/25/02 All: Administrative issues.		
MI	Iron	Michigan Communications Directoi Association	04/30/01	Service activated 2/27/02 All: Administrative issues.		
MI	Ontonagon	Michigan Communications Directoi Association	04/30/01	State: MCDA has requested calls be re-routed and delivered to Negaunee PSAP. County does not yet have Enhanced 9-1-1 capability.	ACC is ready to deploy Phase I services in jurisdiction. ACC has not received formal request to re-route Phase I; learned through its vendor that state has requested re-routing to	12/31/02

State	County	Requesting Entity Name	Request Date ¹	Status/Reason for Delay	Steps Taken to Resolve Deployment Problems for Requests Pending Over Six Months	Expected Deployment Date
					Negaunee PSAP. ACC is working with its vendor to complete deployment as soon as possible.	
MI	Keweenaw	Michigan Communications Director Association	04/30/01	State: MCDA has requested calls be re-routed and delivered to Negaunee PSAP. County does not yet have Enhanced 9-1-1 capability.	ACC is ready to deploy Phase I services in jurisdiction. ACC has not received formal request to re-route Phase I; learned through its vendor that state has requested re-routing to Negaunee PSAP. ACC is working with its vendor to complete deployment as soon as possible.	12/31/02
MI	Houghton	Michigan Communications Director Association	04/30/01	Service activated 3/28/02. All: Administrative issues.		
MI	Baraga	Michigan Communications Director Association	04/30/01	State: MCDA has requested calls be re-routed and delivered to Negaunee PSAP. County does not yet have Enhanced 9-1-1 capability.	ACC is ready to deploy Phase I services in jurisdiction. ACC has not received formal request to re-route Phase I; learned through its vendor that state has requested re-routing to Negaunee PSAP. ACC is working with its vendor to complete deployment as soon as possible.	12/31/02
MI	Gogebic	Michigan Communications Director Association	04/30/01	State: MCDA has requested calls be re-routed and delivered to Negaunee PSAP. County does not yet have	ACC is ready to deploy Phase I services in jurisdiction. ACC has not received formal request to re-route Phase I; learned through its vendor that state has	12/31/02

State	County	Requesting Entity Name	Request Date	Status/Reason for Delay	Steps Taken to Resolve Deployment Problems for Requests Pending Over Six Months	Expected Deployment Date
				Enhanced 9-1-1 capability	requested re-routing to Negaunee PSAP. ACC is working with its vendor to complete deployment as soon as possible.	
MN	Aitkin	State of Minnesota, Department of Administration, Statewide 9-1-1 Program	01/31/01	State. Awaiting approval by State for mapping and routing technology.	ACC is ready to deploy Phase I services in jurisdiction. ACC has participated in numerous conference calls with State and its vendor in effort to expedite resolving issues raised by State's mapping and routing preferences.	12/31/02
MN	Becker	State of Minnesota, Department of Administration, Statewide 9-1-1 Program	01/31/01	2 of 4 sites activated on 6127102. State: Awaiting approval by State for mapping and routing technology for remaining 2 cell sites	ACC is ready to deploy Phase I services in jurisdiction. ACC has participated in numerous conference calls with State and its vendor in effort to expedite resolving issues raised by State's mapping and routing preferences.	12/31/02
MN	Beltrami	State of Minnesota, Department of Administration, Statewide 9-1-1 Program	01/31/01	2 of 3 cell sites activated on 7110102. State Awaiting approval by State for mapping and routing technology for remaining cell site.	ACC is ready to deploy Phase I services in jurisdiction. ACC has participated in numerous conference calls with State and its vendor in effort to expedite resolving issues raised by State's mapping and routing preferences.	12/31/02
MN	Carlton	State of Minnesota, Department of Administration, Statewide	01/31/01	State Awaiting approval by State for mapping and routing technology	ACC is ready to deploy Phase I services in jurisdiction. ACC has participated in numerous	12/31/02

State	County	Requesting Entity Name	Request Date ¹	Status/Reason for Delay	Steps Taken to Resolve Deployment Problems for Requests Pending Over Six Months	Expected Deployment Date
		9-1-1 Program			conference calls with State and its vendor in effort to expedite resolving issues raised by State's mapping and routing preferences.	
MN	Cass	State of Minnesota, Department of Administration, Statewide 9-1-1 Program	11/31/01	8 of 12 cell sites activated on 7/10/02. State Awaiting approval by State for mapping and routing technology for remaining 4 cell sites.	ACC is ready to deploy Phase I services in jurisdiction. ACC has participated in numerous conference calls with State and its vendor in effort to expedite resolving issues raised by State's mapping and routing preferences.	12/31/02
MN	Crow Wing	State of Minnesota, Department of Administration, Statewide 9-1-1 Program	11/31/01	State: Awaiting approval by State for mapping and routing technology.	ACC is ready to deploy Phase I services in jurisdiction. ACC has participated in numerous conference calls with State and its vendor in effort to expedite resolving issues raised by State's mapping and routing preferences.	12/31/02
MN	Douglas	State of Minnesota, Department of Administration, Statewide 9-1-1 Program	11/31/01	Service activated on 6/27/02. All: Administrative issues.		
MN	Grant	State of Minnesota, Department of Administration, Statewide 9-1-1 Program	11/31/01	Service activated on 7/08/02. All: Administrative issues.		
MN	Hubbard	State of Minnesota, Department of Administration, Statewide	11/31/01	State: Awaiting approval by State for mapping and routing technology.	ACC is ready to deploy Phase I services in jurisdiction. ACC has participated in numerous	12/31/02

State	County	Requesting Entity Name	Request Date	Status/Reason for Delay	Steps Taken to Resolve Deployment Problems for Requests Pending Over Six Months	Expected Deployment Date
		9-1-1 Program			Conference calls with State and its vendor in effort to expedite resolving issues raised by State's mapping and routing preferences.	
MN	Itasca	State of Minnesota, Department of Administration, Statewide 9-1-1 Program	01/31/01	7 of 8 cell sites activated on 7/12/02 State Awaiting approval by State for mapping and routing technology for remaining cell site	ACC is ready to deploy Phase I services in jurisdiction. ACC has participated in numerous conference calls with State and its vendor in effort to expedite resolving issues raised by State's mapping and routing preferences.	12/31/02
MN	Kanabec	State of Minnesota, Department of Administration, Statewide 9-1-1 Program	01/31/01	Service activated on 7/03/02 All: Administrative issues.		
MN	Koochiching	State of Minnesota, Department of Administration, Statewide 9-1-1 Program	01/31/01	State: Awaiting approval by State for mapping and routing technology.	ACC is ready to deploy Phase I services in jurisdiction. ACC has participated in numerous conference calls with State and its vendor in effort to expedite resolving issues raised by State's mapping and routing preferences.	12/31/02
MN	Lake	State of Minnesota, Department of Administration, Statewide 9-1-1 Program	01/31/01	State: Awaiting approval by State for mapping and routing technology.	ACC is ready to deploy Phase I services in jurisdiction. ACC has participated in numerous conference calls with State and its vendor in effort to expedite resolving issues raised by State's mapping and routing	12/31/02

State	County	Requesting Entity Name	Request Date	Status/Reason for Delay	Steps Taken to Resolve Deployment Problems for Requests Pending Over Six Months	Expected Deployment Date
MN	Mille Lacs	State of Minnesota, Department of Administration, Statewide 9-1-1 Program	01/31/01	State: Awaiting approval by State for mapping and routing technology.	ACC is ready to deploy Phase I services in jurisdiction. ACC has participated in numerous conference calls with State and its vendor in effort to expedite resolving issues raised by State's mapping and routing preferences.	12/31/02
MN	Morrison	State of Minnesota, Department of Administration, Statewide 9-1-1 Program	01/31/01	State: Awaiting approval by State for mapping and routing technology	ACC is ready to deploy Phase I services in jurisdiction. ACC has participated in numerous conference calls with State and its vendor in effort to expedite resolving issues raised by State's mapping and routing preferences.	12/31/02
MN	Otter Tail	State of Minnesota, Department of Administration, Statewide 9-1-1 Program	01/31/01	Service activated on 6/27/02. All: Administrative issue!		
MN	Pine	State of Minnesota, Department of Administration, Statewide 9-1-1 Program	01/31/01	5 of 7 cell sites activated on 6/27/02. State: Awaiting approval by State for mapping and routing technology for remaining 2 cells.	ACC is ready to deploy Phase I services in jurisdiction. ACC has participated in numerous conference calls with State and its vendor in effort to expedite resolving issues raised by State's mapping and routing preferences.	12/31/02
MN	Pope	State of Minnesota, Department of Administration, Statewide	01/31/01	State: Awaiting approval by State for mapping and routing technology.	ACC is ready to deploy Phase I services in jurisdiction. ACC has participated in numerous	12/31/02

State	County	Requesting Entity Name	Request Date	Status/Reason for Delay	Steps Taken to Resolve Deployment Problems for Requests Pending Over Six Months	Expected Deployment Date
		9-1-1 Program			conference calls with State and its vendor in effort to expedite resolving issues raised by State's mapping and routing preferences	
MN	St Louis North	State of Minnesota, Department of Administration, Statewide 9-1-1 Program	01/31/01	14 of 17 cell sites activated on 8/02/02. State: Awaiting approval by State for mapping and routing technology for remaining 3 cells.	ACC is ready to deploy Phase I services in jurisdiction. ACC has participated in numerous conference calls with State and its vendor in effort to expedite resolving issues raised by State's mapping and routing preferences.	12/31/02
MN	St Louis South	State of Minnesota, Department of Administration, Statewide 9-1-1 Program	01/31/01	18 of 26 cell sites activated on 8/23/02. State: Awaiting approval by State for mapping and routing technology for remaining 8 cells.	ACC is ready to deploy Phase I services in jurisdiction. ACC has participated in numerous conference calls with State and its vendor in effort to expedite resolving issues raised by State's mapping and routing preferences.	12/31/02
MN	Swift	State of Minnesota, Department of Administration, Statewide 9-1-1 Program	01/31/01	Service activated on 5/06/02, All: Administrative issues.		
MN	Todd	State of Minnesota, Department of Administration, Statewide 9-1-1 Program	01/31/01	State: Awaiting approval by State for mapping and routing technology.	ACC is ready to deploy Phase I services in jurisdiction. ACC has participated in numerous conference calls with State and its vendor in effort to expedite resolving issues raised by State's mapping and routing	12/31/02

State	County	Requesting Entity Name	Request Date	Status/Reason for Delay	Steps Taken to Resolve Deployment Problems for Requests Pending Over Six Months	Expected Deployment Date
MN	Wadena	State of Minnesota, Department of Administration, Statewide 9-1-1 Program	01/31/01	Service activated on 5/06/02. All: Administrative issues.	preferences.	
MN	Wilkin	State of Minnesota, Department of Administration, Statewide 9-1-1 Program	01/31/01	State: Awaiting approval by State for mapping and routing technology.	ACC is ready to deploy Phase I services in jurisdiction. ACC has participated in numerous conference calls with State and its vendor in effort to expedite resolving issues raised by State's mapping and routing preferences.	12/31/02
OH	Hocking	Hocking County	03/01/02	Service activated on 6/18/02.		
KS	Montgomery	Montgomery County	7/15/02*	At time of request, the PSAP did not have trunking from the SIR. Nevertheless, ACC began the process of deploying Phase I services, and the PSAP has since obtained the trunking. ACC. Deployment underway.	Not applicable, as request has not been pending for six months. Nevertheless, ACC has is working diligently to deploy Phase I services in the County within 6 months of the request. – i.e., by 1/15/03	1/15/03

STATUS OF RESPONSE TO PHASE II INQUIRIES/REQUEST--

State	County	Requesting Entity Name	'Request' Date	Status	Steps Taken to Resolve Deployment Problems	Expected Deployment Date
MN*	All counties serviced by ACC as listed above in Phase I Table	State of Minnesota, Department of Administration, Statewide 9-1-1 Program	13/11/2001	<ul style="list-style-type: none"> - ACC responded to State of Minnesota ("State") by letter, (dated 4/17/2001), requesting verification of Phase II capabilities and cost recovery mechanism. - State did not respond to request. - ACC filed Petition for Waiver of FCC's Phase II rules (914101). - State filed letter (dated 9/11/01) with FCC seeking correction to text of ACC's Petition for Waiver. - ACC replied again requesting documentation of readiness. - To date, ACC has not received demonstration from the State re: its Phase II capabilities or the status of a cost recovery mechanism. 	As discussed, ACC has made repeated attempts to confirm State's Phase II capabilities and whether it has a cost recovery mechanism in place for Phase II deployment.	ACC no longer consider State's Phase II request active and has no plans to deploy Phase II in the state until it receives a new request and documentation pursuant to <i>Richardson</i> .
NY	Rowan	Morehead Police	5/15/02	<ul style="list-style-type: none"> - ACC responded to Rowan County ("County") by letter, (dated 5/22/2002) requesting demonstration of capabilities to which there was no reply. - ACC sent second letter to the County on 7/30/02 	As discussed, ACC has made repeated attempts to confirm County's Phase II capabilities and whether it has a cost recovery mechanism in place for Phase II deployment.	ACC currently has no plans to deploy Phase II services to County. ACC will discuss timing of delivery of Phase II services with County upon demonstration of readiness pursuant to

				<p>requesting verification of readiness.</p> <ul style="list-style-type: none"> - County replied by letter (received 8/19/2002) notifying ACC that it employs a NCAS Phase I solution and that a third-party vendor has scheduled Phase II software upgrades - ACC sent follow-up correspondence (dated 8/28/02), requesting clarification of the information provided 8/19/02, and complete demonstrations of readiness pursuant to <i>Richardson</i>. - ACC has received no response to its 8/26/02 correspondence. 		<i>Richardson</i> proceeding
CS	Montgomery	Montgomery County	7/15/02*	<p>-- In light of situation with the PSAP's facilities in Montgomery County ("County"), ACC sent correspondence to County (dated 10/29/02) requesting demonstration of readiness pursuant to <i>Richardson</i>.</p>	N/A	ACC will discuss timing of delivery of Phase II services with County upon demonstration of readiness pursuant to <i>Richardson</i>
OH	Hocking	Hocking County	03/11/02	<ul style="list-style-type: none"> - ACC responded to Hocking County ("County") by letter, (dated 4/15/2002) requesting verification of capabilities and cost 	N/A	ACC intends to deploy Phase II services to the County by March 1, 2003

			<p>recovery mechanism.</p> <ul style="list-style-type: none"> - County replied to this letter on 4/16/2002 notifying ACC of particular Phase II compliant capabilities. - ACC sent letter 10/3/02 notifying County that it is considering request to be “valid” and plans to deliver Phase II services by 3/1/03, but also is requesting demonstrations pursuant to <i>Richardson</i>. - County replied by letter (dated 10/7/02) stating County fully Phase II compliant and that LEC has indicated no cost recovery mechanism in place, but will not cause delay. 		
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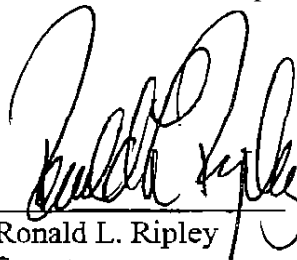
* Contact indicated entity was “requesting” deployment of both Phase I and Phase II services

AFFIDAVIT OF RONALD L. RIPLEY

I, Ronald L. Ripley, do hereby declare that the following is true and accurate:

I ~~am~~ an officer of American Cellular Corporation ("ACC").

I have reviewed the ACC E911 Phase II Quarterly Report ("Report") and to the best of my knowledge, information, or belief, all of the information contained in the Report is truthful and accurate.



Ronald L. Ripley
Secretary

Executed on: Nov 1, 2002

CERTIFICATE OF SERVICE

I, Karen S. Freeman, hereby certify that on the 1st day of November 2002, I caused copies of the foregoing "Quarterly Report" to be sent by either first class mail, postage pre-paid, or by hand delivery (*) to the following:

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Chief
Enforcement Bureau
Federal Communications Bureau
445 12th Street, S.W., Room 7C-485
Washington, D.C. 20554

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Karen S. Freeman